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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

AMANDA GOURLEY,

Defendant.

CASE NO. 1:20-CR-00238-JLT

GOVERNMENT'S SENTENCING
MEMORANDUM

I. INTRODUCTION

Defendant Amanda Gourley is scheduled for sentencing on August 14, 2023, following her guilty plea to Conspiracy to Possess and Possession with Intent to Distribute (Count 5). In the Presentence Investigation Report (PSR), the U.S. Probation Office recommends a 78-month term of imprisonment, 2 years supervised release, a \$100 special assessment, and no fine.

The appropriate guideline range is 78-97 months incarceration, as defendant has satisfied safety valve requirements. Pursuant to the plea agreement between the parties, the government recommends a term of 78 months incarceration.

II. STATEMENT OF FACTS

A. Defendant's Conduct

As stated in the PSR and in the Factual Basis of the Plea Agreement, defendant's conduct is as follows:

1 Beginning on September 20, 2020, and continuing through on or about November 19, 2020, in
2 the Eastern District of California and elsewhere, defendant conspired with others, both known and
3 unknown, to distribute and possess with the intent to distribute a controlled substance.

4 On or about October 12, 2020, co-defendants Stephanie Madsen and Kenneth Bash planned to
5 transport methamphetamine from the Los Angeles area to Montana. Between October 13 and October
6 14, 2020, Madsen packed methamphetamine, which was picked up by Jacob Renshaw and put into the
7 door panels of a Kia Optima, rented by defendant in Fresno, CA, EDCA.

8 Defendant traveled with co-defendants including Renshaw towards Montana with the
9 methamphetamine in the door panels of said vehicle.

10 On October 15, 2020, the co-defendants were pulled over in Utah and a search of the
11 aforementioned Kia Optima recovered approximately 12 pounds of methamphetamine from inside the
12 door panels of the vehicle.

13 After the vehicle was impounded, defendant returned to Utah, at the urging of Bash, in order to
14 obtain the rented vehicle, and also to take possession of the 12 pounds of methamphetamine from the
15 door panels of the vehicle if law enforcement had not found it.

16 **III. ANALYSIS OF THE SECTION 3553(A) FACTORS**

17 In sentencing a defendant, 18 U.S.C. § 3553(a)(1) requires the Court to consider the nature and
18 circumstances of the offense and the history and characteristics of defendant. 18 U.S.C. § 3553(a)(2)
19 requires the Court to consider the need for the sentence to reflect the seriousness of the offense, to
20 promote respect for the law, to provide just punishment for the offense, to afford adequate deterrence to
21 criminal conduct, and to protect the public from Defendant's further crimes.

22 The Government agrees with the assessment and analysis of these factors as listed in the PSR
23 and believe the weight of these factors has been reflected in the recommended sentence.

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By: /s/ STEPHANIE M. STOKMAN
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